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"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

VIA ECF

February 5, 2020

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: *In re Terrorist Attacks on September 11, 2001*
Case No. 03 MDL 1570 (GBD)(SN)
Burnett, et al. v. The Islamic Republic of Iran, et al.
Case No. 15 CV 9903 (GBD)(SN)**

Dear Judge Daniels:

I represent plaintiffs in the above-referenced case and write today in response to the Court's Order pertaining to the January 15, 2020 motion from *Burnett* wrongful-death plaintiffs seeking default judgments on their claims. *See* ECF No. 5832 (regarding ECF No. 5670). The Court ordered undersigned counsel to "file an amended exhibit indicating the name of the individual plaintiff—who must be identified by name on either the 9/11 multidistrict litigation docket or on the member case docket—representing each listed decedent." ECF No. 5832 at 2. In accordance with the Court's Order, Plaintiffs hereby submit an amended Exhibit A to accompany their motion for default judgment that indicates the name of the personal representative of the estate and where these parties appear either in Plaintiffs' Amended Complaint (Case No. 15-cv-9903, ECF No. 53) or in other pleadings submitted by counsel to the Court. As the Court noted in its Order, there were 616 decedent estates on the original Exhibit A. In our review, we determined that there were two duplicates on the original Exhibit A—line 24 for the Estate of Michael Asciak and line 538 for the Estate of George Strauch. These duplicates have been removed from the Amended Exhibit A, so there are only claims for 614 9/11 decedent estates now appearing on the Exhibit.

In addition, Plaintiffs have filed two supplements to the motion at issue here to include damages for economic loss for those estates where only pain and suffering were sought previously. *See* ECF Nos. 5725, 5833. Plaintiffs request that any judgment entered for the decedent estates from *Burnett* XVI also include judgments for economic loss as set forth in these two supplemental filings.



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Should the Court have any additional questions or concerns regarding the Exhibit, counsel will ensure timely responses to any such questions or concerns.

Respectfully,

A handwritten signature in black ink, appearing to read "John M. Eubanks", written in a cursive style.

John M. Eubanks

Enclosure (Amended Exhibit A to ECF No. 5668)

cc: All Counsel of Record (via ECF)